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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

WILLIAM X. NIETZCHE, solely as Trustee
for KRME International Trust; WILLIAM
KINNEY, JR.; and JULIE ANN METCALF
KINNEY ,

Plaintiffs,

v.

FREEDOM HOME MORTGAGE
CORPORATION (FHMC); MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS
(MERS); BENEFICIAL OREGON INC.
(BOI); HSBC HOLDINGS PLC (HSBC);
REGIONAL TRUSTEE SERVICES
CORPORATION (RTSC); MTGLQ
INVESTORS L.P. (MTGLQ); RUSHMORE
LOAN MANAGEMENT SERVICES LLC
(RLMS); U.S. BANK NATIONAL
ASSOCIATION (USBNA); CLEAR RECON
CORPORATION (CRC); BARRISTERS
SUPPORT SERVICES (BSS); URBAN
HOUSING DEVELOPMENT (UHD); et al;
Defendants.

Case No. 3:18-cv-1930-SI

**DEFENDANT URBAN HOUSING
DEVELOPMENT LLC and ROMAN
OZERUGA'S MOTION TO EXTEND
TIME TO FILE RESPONSE TO
PLAINTIFFS' FIRST AMENDED
COMPLAINT**

(EXPEDITED CONSIDERATION
REQUESTED)

LR 7-1(a) CERTIFICATION

Counsel for Defendant Urban Housing Development LLC and Roman Ozuerga emailed and spoke with Plaintiff William X. Nietzsche on April 18, 2019, to discuss the extension of time. Mr. X Nietzsche stated that he took no position on the extension sought and further stated that he would contact the other plaintiffs to see if they would take a position on the extension and get back to counsel by noon today; no message was left by noon today, however.

MOTION

Pursuant to Fed. R. Civ. P. 6(b) and LR 16-3, Defendants Urban Housing Development LLC and Roman Ozeruga respectfully move this Court for an order extending the deadline for Defendants to file a responsive pleading(s) to Plaintiffs' First Amended Complaint to May 10, 2019.

Plaintiffs' First Amended Complaint is 67 pages and contains 512 paragraphs and Defendants need additional time to prepare a response. Further, Plaintiffs have named counsel as a defendant and additional time is necessary to address the issues created by naming counsel.

This motion is not made for the purpose of delay. As set forth above, Defendants have shown good cause why the deadline should be modified, have recommended a new date for the deadline in question, as required by LR 16-3, and Plaintiffs have not indicated that they oppose the motion.

Dated this 19th of April, 2019

Slominski & Associates

/S/TERRANCE J. SLOMINSKI

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Of Attorneys for Defendant Urban Housing Development
LLC and Roman Ozeruga

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **MOET** on:

William X. Nietzsche
Julie A. Metcalf Kinney
William Kinney, Jr.
4406 N. Mississippi
Portland, OR 97217

by the following indicated method or methods:

To Plaintiffs

 X by **mailing** a full, true and correct copy of said documents in a sealed, first-class, postage-prepaid envelope, addressed to the attorney(s) as shown above on the date set forth below.

 by causing a full, true and correct copy to be **hand-delivered** to the attorney on the date set forth below.

 by sending a full, true and correct copy via **overnight courier** on the date set forth below.

For Counsel

 by **electronically mailing** a full, true and correct copy to the attorney at the last-known email address for the attorney's office, on the date set forth below.

 X through Court ECM system

Dated this 19th of April, 2019

/s/ Terrance Slominski